

Greenbaum Rowe
Smith & Davis LLP

COUNSELORS AT LAW

75 LIVINGSTON AVENUE

SUITE 301

ROSELAND, NJ 07068-3701

(973) 535-1600 FAX (973) 535-1698

INFO@GREENBAUMLAW.COM

WWW.GREENBAUMLAW.COM

C. BRIAN KORNBERG
(973) 577-1820 - DIRECT DIAL
(973) 577-1821 - DIRECT FAX
BKORNBERG@GREENBAUMLAW.COM

NEW YORK OFFICE:
750 THIRD AVENUE
9TH FLOOR
NEW YORK, NY 10017
(212) 847-9858

July 22, 2019

VIA ECF

Hon. Ann Marie Donio, U.S.M.J.
Mitchell H. Cohen Federal Building
and U.S. Courthouse
1 John F. Gerry Plaza
Camden, New Jersey 08101

Re: **Sippel v. American Honda Motor Co., Inc.**
Civil Action No. 1:18-CV-09662 (NLH) (AMD)

Dear Magistrate Judge Donio:

The undersigned represents defendant American Honda Motor Co., Inc. ("AHM"), in this matter. Please accept this letter as the response of the parties to the Court's request [ECF 23] for a status report in advance of the Court scheduling an arbitration in this matter.

The remaining discovery relates to the record authorizations permitted by the Court in its ruling of April 25, 2019 [ECF 16]. Of the previously outstanding records, only two remain:

1. **Horizon Blue Cross Blue Shield:** Plaintiff forwarded the specific form of authorization required by Horizon on July 18, 2019, and this has been transmitted to Horizon. We anticipate receipt of the records in the next 30 days.
5. **Camden County Police Department:** Despite numerous follow-up inquiries, this entity had failed to provide the requested documents. Therefore, we issued and served a subpoena for the records which was returnable on July 23, 2019. We were contacted by County Counsel today and asked to provide authorizations in different forms. We will proceed accordingly.

Based on this status and August vacation schedules, we request that the Court defer scheduling an arbitration until September.

Plaintiff's counsel has consented to this submission.

Honorable Ann Marie Donio, U.S.M.J.
July 22, 2019
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Thank you for your consideration of this matter.

Respectfully submitted,
GREENBAUM, ROWE, SMITH & DAVIS, LLP

/s/ C. Brian Kornbrek

C. BRIAN KORNBREK

CBK/mep
Enclosure
cc: Mario Barnabei, Esq. (via ECF)
Timothy J. Abeel, Jr., Esq. (via ECF)